

REMARKS

Reconsideration and allowance of the subject application are respectfully solicited.

Claims 19, 24, 25, 30, and 31 are pending, with Claims 19, 25, and 31 being independent. Claims 21 and 27 have been cancelled without prejudice, and their features incorporated into Claims 19 and 25, respectively. Claim 19 has been amended in like fashion.

Claims 19, 21, 24, 25, 27, 30, and 31 were rejected under 35 U.S.C. § 102(e) over newly-cited US 6,847,405 B2 (Hsu, et al.). All rejections are respectfully traversed.

Claims 19, 25, and 31 variously recite, *inter alia*, determining whether motion information on an interpolation pixel is a moving image or a still image based on the motion information on a reference pixel adjacent to an interpolation pixel in a field of interest, and the motion information on a reference pixel in a field previous the field of interest and the motion information on a reference pixel in a next field following the field of interest, the reference pixels in the previous field and the next field being at the same position as the interpolation pixel in the field of interest, in combination with determining the motion information on the interpolation pixel in the field of interest as a moving image when the motion information on the reference pixel adjacent to the interpolation pixel in the field of interest indicates a moving image, or when both of the motion information on the reference pixel in the field previous to the field of interest and the motion information on the reference pixel in the next field indicate a moving image, and otherwise, determining the motion information on the interpolation pixel in the field of interest as a still image.

However, Applicants respectfully submit that Hsu, et al. fails to disclose or suggest at least the above-discussed claimed features as recited, *inter alia*, in Claims 19, 25, and 31.

Applicants respectfully submit that Hsu, et al. discloses, e.g., using pixel information of a current field, previous field, and future field (Abstract), and using pixel information associated with nearby pixels A, B, C, and D found in fields (-1) , (n) , and $(n+1)$ (e.g., col. 6, lines 3 et seq.), and determining the pixel level motion strength interpolation M_p (e.g., col. 6, line 28); however, Applicants respectfully submit that neither the foregoing nor the

remainder of Hsu, et al. provides either a description or a suggestion of at least the above-discussed claimed features as recited, *inter alia*, in Claims 19, 25, and 31.

Applicants further respectfully submit that there has been no showing of any indication of motivation in the cited documents that would lead one having ordinary skill in the art to arrive at the above-discussed claimed features.

The dependent claims are also submitted to be patentable because they set forth additional aspects of the present invention and are dependent from independent claims discussed above. Therefore, separate and individual consideration of each dependent claim is respectfully requested.

Applicants submit that this application is in condition for allowance, and a Notice of Allowance is respectfully requested.

Applicants' undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our address given below.

Respectfully submitted,

/Daniel S. Glueck/
Daniel S. Glueck
Attorney for Applicants
Registration No. 37,838

FITZPATRICK, CELLA, HARPER & SCINTO
30 Rockefeller Plaza
New York, New York 10112-3800
Facsimile: (212) 218-2200
DSG/ijr

FCHS_WS 2219486v1